

MONTANA-DAKOTA UTILITIES CO.

A Division of MDU Resources Group, Inc.

400 North Fourth Street
Bismarck, ND 58501
(701) 222-7900

August 17, 2001

Jeffery L. Burgess, Director
Division of Air Quality
North Dakota Department of Health
P.O. Box 5520
Bismarck ND 58506-5520



Dear Mr. Burgess:

In your July 3, 2001 letter, you requested information related to sulfur dioxide (SO₂) emission rates for Montana-Dakota Utilities Co.'s R.M. Heskett Station Units 1 and 2 for the years 1976 and 1977, and attached tables containing the Department of Health's (DOH) estimates.

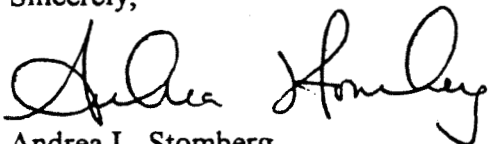
Montana-Dakota staff have reviewed the data, and agree that it may be reasonably representative of emissions for those years. During that time period, we relied on periodic emission tests, coal quality data and usage and hours of operation to calculate emissions for submittal in annual emission inventory reports. Our records indicate that the parameters listed in the DOH *Historical SO₂ Emissions* tables reflect the information submitted in the annual emission inventories for the noted years.

Of the numbers presented in the tables, we were unable to verify the maximum coal feed rates. Using fuel rates derived from capability tests performed in September, 1977 for Unit 1 and during November of 1977 for Unit 2, the maximum feed rates would be 29.8 tons/hour and 69.1 tons/hour, respectively. Please substitute these feed rates for those in your tables. This hourly rate may be used to calculate the three and 24 hour emission rates.

Montana-Dakota understands that in narrow cases allowable emissions may be used as baseline emission rates. Where the rules allow this, we urge the Department to utilize the allowable levels.

If you have any questions, please feel free to contact me at 222-7752.

Sincerely,



Andrea L. Stomberg
Environmental Manager

cc: **Martin White**
Bruce Imsdahl
Alan Welte
Gary Gress